

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

CURLING PLAINTIFFS' MOTION FOR EXCESS PAGES

Pursuant to Local Rule 7.1(D), Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (the “Curling Plaintiffs”) move for twenty (20) additional pages for their Reply in support of Motion for Preliminary Injunction. Under the Local Rules, the page limit for such brief is fifteen (15) pages. Curling Plaintiffs respectfully request leave to file a brief of no longer than thirty-five (35) pages.

In support of this Motion, Curling Plaintiffs submit respectfully that this case’s complexity, the delay in obtaining necessary discovery from State Defendants, the volume of State Defendants’ document production (including thousands of pages of irrelevant documents), and the need to properly and fully respond to State Defendants’ many allegations and arguments (totaling more than 100 pages of briefing and declarations) necessitates more pages than an ordinary

reply motion. Moreover, the parties previously recognized that the timing of State Defendants' document discovery—after unnecessary delays—would require Curling Plaintiffs to submit new evidence with their reply, for which State Defendants receive a sur-reply (notwithstanding that the party with the burden typically is afforded the last word). An additional 20 pages is needed. Curling Plaintiffs anticipate this Court will be surprised and disturbed by what their reply will bring to light about Georgia's unreliable voting system and what it means for voter confidence and disenfranchisement.

A proposed order is attached hereto.

Dated: August 31, 2020

Respectfully submitted,

/s/ David D. Cross

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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross

David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2020, a copy of the foregoing **CURLING PLAINTIFFS' MOTION FOR EXCESS PAGES** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross
David D. Cross